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MAY 16 1985

Mr. Jim Jensen
Square D Company
3700 Sixth Street, S.W.
Cedar Rapids, Iowa 52406

Dear Mr. Jensen:

This letter is in response to your April 4, 1985 letter to Pat Ritchey and your subsequent phone conversation with Faye Sandberg. From the description of your acid stripping solution, it appears to be regulated under the Redefinition of Solid Waste published in the January 4, 1985 Federal Register. In particular, please refer to Subpart F, Section 266.70 which pertains to Recyclable Materials Utilized for Precious Metal Recovery. In accordance with this provision, it will be necessary for you to amend your Resource Conservation and Recovery Act (RCRA) notification form to include this waste. For your convenience, we are enclosing a copy of your most recent notification and a blank notification form. You may make the addition directly on the copy of your notification form providing that it is recertified and dated.

From your telephone conversation, it did not sound as if you intend to treat, dispose or store regulated quantities of the stripping solution onsite for more than 90 days. If this is the case, the only action that you must take is to update or complete and return the notification form. If, however, it is decided that your facility would like to treat, store or dispose of the stripping waste, we suggest that you complete the attached Part A permit application and return it to the Environmental Protection Agency (EPA) before July 5, 1985, so that your facility may achieve interim status.

Interim status allows a facility to continue treating, storing or disposing of waste without a RCRA hazardous waste permit. According to the current interpretation of the Redefinition of Solid Waste, in order to achieve interim status a facility must have notified EPA of their hazardous waste activities covered by this regulation by April 4, 1985; submitted to EPA a Part A permit



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application by July 5, 1985, and be treating, storing or disposing of the waste on July 5, 1985. Since your facility submitted an letter notification postmarked April 4, 1985, you are administratively eligible for interim status.

If you have any questions, please call Ms. Faye Sandberg at (816) 374-6534.

Sincerely yours,

Chet McLaughlin
Chief, State Programs Section
RCRA Branch
Waste Management Division

Enclosure

cc: Gene Evans, IDWAWM